

**IN THE DISTRICT COURT FOR THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CR. No.: 2:06CR206-MHT
)	
KEVIN ONEIL BROWN)	

**UNOPPOSED MOTION TO CONTINUE IN ORDER TO ALLOW MENTAL
EVALUATION OF THE DEFENDANT**

COMES NOW the Defendant, Kevin Oneil Brown, by and through counsel, William R. Blanchard, and shows as follows:

1. Undersigned counsel was initially appointed to represent the Defendant, Kevin Oneil Brown, on September 14, 2006, in connection with a superseding indictment charging Brown and his co-defendant, Alethia Adrianne Scott, with conspiracy to commit fraud and the theft of Government property.
2. Investigation completed thus far reveals that Defendant Kevin Oneil Brown is receiving disability benefits due to a severe head injury and that he has recently reported experiencing visual and auditory hallucinations.
3. The undersigned believes that it would be the professionally reasonable and prudent course to extend the investigation in this matter by having the Defendant submitted to a defense mental evaluation by a qualified expert.
4. Having been appointed only one month ago, the undersigned has not had a sufficient opportunity to arrange for and complete the proposed psychological evaluation of the Defendant.

5. The Defendant is on pretrial release and is willing to waive his speedy trial rights in order to undergo the proposed evaluation.
6. Counsel for the Government, Chris Snyder, does not oppose this motion.
7. Mr. Brown's waiver of speedy trial is attached to this motion.

WHEREFORE, Defendant Kevin Brown moves for a continuance of this case in order that he may undergo a mental evaluation.

RESPECTFULLY SUBMITTED this 16th day of October 2006.

s/ William R. Blanchard
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WAIVER OF SPEEDY TRIAL ACT RIGHTS

I, Kevin Oneil Brown, defendant in the above-styled case, do hereby waive my rights to a speedy trial as established in 18 U.S.C. § 3161 et seq. I certify to the Court that I am waiving these rights knowingly, voluntarily, and intelligently after receiving a full and complete explanation of my rights given to me by my attorney and,

WITH FULL KNOWLEDGE OF MY RIGHTS, I HEREBY EXPRESSLY WAIVE MY RIGHTS TO A SPEEDY TRIAL.

10/16/06
Date

Kevin O. Brown
Defendant

10/16/06
Date

[Signature]
Attorney for the Defendant